

**UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA**

CERTAIN UNDERWRITERS AT  
LLOYD'S OF LONDON, *et al.*,

Plaintiffs,

V.

STRONG TOWER CONSTRUCTION,  
LLC, f/k/a/ KOCH CORPORATION,

Defendant.

: CIVIL ACTION  
:  
:  
: No. 1-24-CV-461  
:  
: (Judge Mehalchick)

**ANSWER TO RULE TO SHOW CAUSE DATED FEBRUARY 24, 2025**

AND NOW comes Defendant Strong Tower Construction, LLC, f/k/a Koch Corporation, by and through its undersigned counsel, and hereby files the following Answer to Rule to Show Cause dated February 24, 2025:

1. On May 29, 2024, Plaintiffs filed an Amended Complaint.
2. On June 18, 2024, Defendant filed a Motion to Dismiss the Amended Complaint, followed by its Brief in Support of the Motion to Dismiss on July 2, 2024.
3. On July 9, 2024, Plaintiffs filed an Unopposed Motion for Extension of Time to Respond to Motion to Dismiss, which was granted.
4. On July 30, 2024, Plaintiffs filed their Brief in Opposition to the Motion to Dismiss.

5. On August 13, 2024, Defendant filed its Reply Brief in Support of the Motion to Dismiss.

6. On January 13, 2025, this Court issued an Order denying Defendant's Motion to Dismiss.

7. Thereafter, Defendant's answer to the Amended Complaint became due on January 27, 2024.

8. Due to a calendaring issue and changing circumstances of Defendant's Counsel, Defendant did not file an answer on January 27, 2024.

9. Defendant's Answer with Affirmative Defenses was under review at the time this Court issued the instant Rule to Show Cause on February 24, 2025.

10. Upon receiving the Rule to Show Cause, Defendant promptly filed its Answer with Affirmative Defenses on February 25, 2025 (Doc. 31).

11. Since the Court issued the Rule to Show Cause, Defendant's Answer with Affirmative Defenses, asserting meritorious defenses to the Amended Complaint, has been filed and no prejudice has been suffered by Plaintiffs as a result of the delay in filing.

WHEREFORE, Defendant Strong Tower Construction, LLC, f/k/a Koch Corporation, respectfully requests this Honorable Court discharge the Rule to Show Cause dated February 24, 2025.

Dated: February 27, 2025

STEVENS & LEE, P.C.

By: /s/ Veronica L. Morrison  
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